

x:\tc52497\adoption

WILLIAM D. JOYCE, III (WDJ9899)  
BARRY, McTIERNAN & MOORE  
2 Rector Street – 14<sup>th</sup> Floor  
New York, New York 10006  
(212) 313-3600

Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X  
SEGUNDO QUIZHPI,

Plaintiffs,

**NOTICE OF  
ADOPTION**

-against-

120 BROADWAY CONDOMINIUM (CONDO #871), 120 BROADWAY HOLDINGS, LLC, 120 BROADWAY PROPERTIES, LLC, 120 BROADWAY, LLC, 160 WATER ST., INC., 160 WATER STREET ASSOCIATES, 20 BROAD STREET CO., 233 BROADWAY OWNERS, LLC, 44101 AUSTIN BLVD CORPORATION, 60 HUDSON OWNER LLC, 90 CHURCH STREET LIMITED PARTNERSHIP, AMBIENT GROUP, INC., AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., BATTERY PARK CITY AUTHORITY, BELFOR USA GROUP, INC., BFP ONE LIBERTY PLAZA CO., LLC., BFP TOWER C CO. LLC., BFP TOWER C MM LLC., BLACKMON-MOORING-STEAMATIC CATASTROPHE, INC. D/B/A BMS CAT, BOARD OF EDUCATION OF THE CITY OF NEW YORK, BOARD OF MANAGERS OF THE 120 BROADWAY CONDOMINIUM (CONDO #871), BOSTON PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP, BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., CITIBANK, NA, DEPARTMENT

**08 CIV 2246**

OF BUSINESS SERVICES, G.L.O. MANAGEMENT, INC., GENERAL RE SERVICES CORP., HILLMAN ENVIRONMENTAL GROUP, LLC., LEHMAN BROTHERS HOLDINGS INC., LEHMAN BROTHERS, INC., LEHMAN COMMERCIAL PAPER, INC., NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY, NEW YORK UNIVERSITY, ONE LIBERTY PLAZA, ONE WALL STREET HOLDINGS, LLC., RECTOR OF TRINITY CHURCH, SABINE ZERARKA, SILVERSTEIN PROPERTIES, INC., STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., THAMES REALTY CO., THE BANK OF NEW YORK COMPANY, INC., THE BOARD OF MANAGERS OF ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE NEW YORK CITY DEPARTMENT OF EDUCATION, THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN SPEYER PROPERTIES, TRAMMELL CROW COMPANY, TRAMMELL CROW CORPORATE SERVICES, INC., TRIBECA LANDING L.L.C., TUCKER ANTHONY, INC., V CUCINIELLO, VERIZON NEW YORK, INC., VORNADO OFFICE MANAGEMENT LLC, WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GO, CORP., WFP RETAIL CO. G.P. CORP., WFP RETAIL CO. L.P., WFP TOWER A CO., WFP TOWER A CO. G.P. CORP., WFP TOWER A CO., L.P., AND WORLD FINANCIAL PROPERTIES, L.P., ET AL

Defendants.

-----X

PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's

Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
July 17, 2008



---

WILLIAM D. JOYCE, III (WDJ 9899)

BARRY, McTIERNAN & MOORE

Attorneys for Defendants

STRUCTURE TONE, INC. s/h/a

STRUCTURE TONE (UK), INC. and

STRUCTURE TONE GLOBAL SERVICES, INC.

2 Rector Street – 14<sup>th</sup> Floor

New York, New York 10006

(212) 313-3600